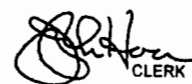


FILED

MAR 09 2016


CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 16-40032

Plaintiff,

INDICTMENT

vs.

EDRAS LIZANDRO CHUA-LEMUS,
a/k/a "Eddy,"
BLANCA E. LUNA-SOTO,
CHAD MICHAEL GOTCH,
LARRY DELBERT GOTCH, JR., and
ROBERT JOSEPH BUDIHAS,

Conspiracy to Distribute a
Controlled Substance; Conspiracy to
Commit Money Laundering

21 U.S.C. §§ 841(a)(1) and 846
18 U.S.C. §§ 1956(a)(1)(B)(i) and
1956(h)

Defendants.

The Grand Jury charges:

COUNT 1.

Beginning at a time uncertain and continuing until the date of this Indictment, in the District of South Dakota and elsewhere, Edras Lizandro Chua-Lemus, a/k/a "Eddy," Blanca E. Luna-Soto, Chad Michael Gotch, Larry Delbert Gotch, Jr., and Robert Joseph Budihas, did knowingly and intentionally combine, conspire, confederate, and agree together, with others known and unknown to the Grand Jury, to knowingly and intentionally distribute 500 grams or more of a mixture and substance containing methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 846.

COUNT 2.

Beginning at a time uncertain and continuing until the date of this Indictment, in the District of South Dakota and elsewhere, Edras Lizandro Chua-Lemus, a/k/a "Eddy," Blanca E. Luna-Soto, and Chad Michael Gotch did knowingly combine, conspire, confederate, and agree together, with others known and unknown to the Grand Jury, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§ 841(a)(1) and 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h).

FORFEITURE ALLEGATION

Upon conviction of either of the offenses alleged in Counts 1 and 2 of this Indictment, Defendants Edras Lizandro Chua-Lemus, a/k/a "Eddy," and Blanca E. Luna-Soto shall forfeit to the United States pursuant to 21 U.S.C. § 853, if convicted of Count 1, and 18 U.S.C. § 982(a)(1), if convicted of Count 2, any property constituting, and derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, and intended to

be used, in any manner or part, to commit, and to facilitate the commission of, the offenses, including, but not limited to, the following:

1. MONEY JUDGMENT

A sum of money representing the amount of proceeds obtained as a result of the offenses – conspiracy to distribute a controlled substance and conspiracy to commit money laundering.

2. SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said Defendants up to the value of the forfeitable property described in paragraph 1 above.

A TRUE BILL:

NAME REDACTED

Foreperson

RANDOLPH J. SEILER
United States Attorney

By: 